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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

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SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA

Plaintiff

v.

(1) CHANDLER BRITAIN BRADFORD

[REDACTED]

(6) TROY VERNON ERBE

(7) JESUS GUZMAN-DELGADO

Defendants

Criminal No. 22-CR-00570-OLG

**THIRD SUPERSEDING
INDICTMENT**

COUNT 1: 18 U.S.C. § 371 & 554(a)
Conspiracy to Smuggle Goods from the
United States

COUNT 2: 18 U.S.C. § 933
Conspiracy to Traffic Firearms

COUNT 3: 18 U.S.C. § 924(h)
Conspiracy to Transfer Firearms for Use in
Felony

COUNTS 4-7: 18 U.S.C. §§ 554(a) & 2
Smuggling of Goods from the United States,
Aiding & Abetting

COUNT 8: 18 U.S.C. § 1956(h)
Conspiracy to Commit Money Laundering

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 371]**

That from on or about June 30, 2018, and continuing up until on or about October 4, 2022,
in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,

[REDACTED]

(6) TROY VERNON ERBE,

(7) JESUS GUZMAN-DELGADO,

knowingly and willfully conspired and agreed together and with others to commit offenses against the United States, that is, knowingly exported and sent firearm parts from the United States, specifically, components and parts for AR-15 rifles, and received, concealed, bought, and facilitated the transportation of these firearm parts prior to exportation, knowing they were intended for exportation contrary to any law or regulation of the United States, to wit, Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), in that Defendants knew they did not have a license or written authorization for such exports, in violation of Title 18, United States Code, Section 554(a).

MANNER AND MEANS

The conspiracy was carried out through the following manner and means, among others:

1. Beginning on or about June 30, 2018, (1) CHANDLER BRITAIN BRADFORD of New Braunfels, Texas, engaged in a multimillion-dollar scheme to illegally provide thousands of AR-15 style firearms to [REDACTED], a Mexican citizen who resided in the Monterrey, Nuevo Leon, Mexico area. BRADFORD supplied enough firearm parts to arm [REDACTED] with approximately 4,800 AR-15-style rifles.

2. The AR-15 is a powerful semi-automatic rifle. The rifle is comprised of a completed upper receiver and a completed lower receiver. A completed upper receiver is made up of over 40 components, including the barrel, bolt carrier group, and charging handle. The upper receiver connects these components to a lower receiver, which is made up of over 30 components and can accept a magazine for ammunition once completed. The lower receiver begins life as a partially completed “80% lower receiver,” which is finished into a “stripped lower receiver,” using a milling tool. This receiver is affixed with other accessories and a lower parts kit, consisting of components such as a trigger assembly, trigger parts, and pistol grip. Put together, the completed

upper receiver and completed lower receiver create a fully functioning AR-15-style rifle. These AR-15-style rifles are highly sought after by Mexican drug cartels for their firepower, reliability, and use in protecting territory and trade.

3. A variety of these firearm parts—including completed upper receivers and 80% lower receivers—are controlled for export from the United States to Mexico pursuant to Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1). Export of these parts to Mexico requires a license obtained from the United States government.

4. BRADFORD never held a license to export controlled firearm parts from the United States to Mexico. Nevertheless, BRADFORD provided the parts, tools, and counsel for [REDACTED] to facilitate a full firearm manufacturing enterprise in northern Mexico. For years, [REDACTED] ordered the parts and tools needed to build functioning AR-15 style rifles from BRADFORD. [REDACTED]'s orders included specific amounts of completed upper receivers, 80% lower receivers, lower receiver part kits, magazines, and manufacturing tools such as firearm manufacturing jigs, milling tools, and drill bits. BRADFORD filled these orders and prepared them for delivery to [REDACTED] in Mexico.

5. Upon receiving gun part orders from [REDACTED], BRADFORD would purchase the components needed to fill the orders. On the Internet, BRADFORD ordered the components to assemble completed upper receivers in New Braunfels—including barrels, bolt carrier groups, and charging handles. BRADFORD also ordered 80% lower receivers, as well as the components making up lower receiver kits and other finishing parts needed for the function of AR-15-style rifles. BRADFORD ordered these components from manufacturers in the United States and China and had them shipped to him at addresses in New Braunfels.

6. Upon receiving these components, BRADFORD worked to complete [REDACTED]

██████████'s orders. BRADFORD assembled completed upper receivers. BRADFORD applied protective coating to the 80% lower receivers and gathered the remaining parts and tools that would be needed to finish the AR-15s. BRADFORD packaged these parts so they could be provided to ██████████ for use in his firearm manufacturing operations.

7. BRADFORD's brother-in-law, (6) TROY VERNON ERBE, assisted BRADFORD by preparing some of the gun part shipments for ██████████. Specifically, ERBE built out completed upper receivers to fill ██████████'s orders. On some occasions, ERBE communicated directly with ██████████ to receive and discuss firearm part orders. BRADFORD paid ERBE for his assistance in preparing the orders.

8. Once the finished parts requested by ██████████ were ready, BRADFORD and ERBE would package them for delivery to Mexico. BRADFORD provided the firearm parts to ██████████ by at least two different means. Originally, BRADFORD and ERBE shipped the parts intended for ██████████ to a mail center in Laredo, Texas.

9. Beginning in 2021, however, BRADFORD began personally driving the packaged gun parts to storage units near the Mexican border, including in Laredo and the Rio Grande Valley. BRADFORD dropped the packaged gun parts off at storage units and texted photographs of the packages to ██████████ to confirm their delivery.

10. ██████████ instructed BRADFORD on which storage facilities BRADFORD should use for delivery, as well as how to access the storage units. BRADFORD also obtained his own storage unit in Pharr, Texas, for use in the conspiracy, with ██████████'s assent.

11. Once the gun part packages were left in the storage units, ██████████ arranged for their retrieval through the use of various couriers. One member of the conspiracy, a

truck driver, accessed the storage units where BRADFORD delivered gun parts in Laredo. There, the co-conspirator would unpack the boxes and repackage them so they could be smuggled to Monterrey by truck drivers in the conspiracy.

12. These truck drivers, including [REDACTED] and (7) JESUS GUZMAN-DELGADO, retrieved the packaged gun parts in Laredo and smuggled them into Mexico by concealing them in trucks.

13. In addition to equipping [REDACTED] with the parts and tools needed to build out finished AR-15 rifles, BRADFORD provided [REDACTED] with advice on manufacturing firearms. [REDACTED] would contact BRADFORD if there were problems with the quality of the guns or gun parts, and BRADFORD would help [REDACTED] troubleshoot these technical problems to ensure that the firearm manufacturing operations in Mexico succeeded.

14. In exchange for BRADFORD's services, and to provide BRADFORD with capital to continue buying gun parts for the conspiracy, [REDACTED] coordinated the movement of large amounts of money to BRADFORD. [REDACTED] arranged for BRADFORD to receive wire transfers from Mexican companies, and bulk sum deposits to BRADFORD's bank account made by individuals in Mexico and South Texas. These companies had addresses in Mexico that were reflected on the wire receipts when money would be transferred to BRADFORD's account. [REDACTED] notified BRADFORD when BRADFORD was going to be paid, as well as the amounts of money BRADFORD would be receiving. BRADFORD kept [REDACTED] informed about any balance that [REDACTED] owed him for his expenditures on gun parts.

15. In total, BRADFORD received over \$3.5 million from [REDACTED], some

of which profited BRADFORD and some of which BRADFORD used to continue buying more gun parts in furtherance of the conspiracy.

OVERT ACTS

In furtherance of the conspiracy and to effect and accomplish its objects, Defendants committed, among others, the overt acts listed below, in the Western and Southern Districts of Texas, and the Republic of Mexico:

16. On October 16, 2020, BRADFORD shipped two packages containing 10 upper receivers with 7" handguards and 10 receivers with A2 front sights to a mail center in Laredo, Texas. BRADFORD texted the FedEx tracking numbers and description of the contents to [REDACTED]. [REDACTED] responded, "You are fast gringo, thank you." BRADFORD answered, "De nada." On October 17, 2020, BRADFORD told [REDACTED] that [REDACTED] owed him \$12,000, but added, "I'll see what else I can ship though and let you know this afternoon." BRADFORD told [REDACTED] he would be traveling to Mexico, and [REDACTED] offered to personally pay BRADFORD there, in pesos or dollars. BRADFORD told [REDACTED], "Maybe \$1.5k usd worth of pesos. And usd dollars if you'd like. Save the wire ha." On October 23, 2020, BRADFORD met with [REDACTED] in Cabo San Lucas, Baja California Sur, Mexico.

17. On November 6, 2020, [REDACTED] asked BRADFORD by text if he could send "some uppers." BRADFORD responded, "Yes 10 7" and 5 A2 today," referring to 10 upper receivers with 7" handguards and five receivers with A2 front sights. The same day, BRADFORD provided [REDACTED] with two FedEx tracking numbers for packages containing these firearm parts. BRADFORD shipped these packages to a mail center in Laredo, addressed to a third party. On November 10, 2020, BRADFORD informed [REDACTED]

that [REDACTED]'s "balance" was \$24,225. That day, BRADFORD received nearly \$10,000 in his bank account, in the form of two wire transfers from a company in Monterrey, Nuevo Leon, Mexico.

18. On December 1, 2020, BRADFORD shipped two packages containing upper receivers to a mail center in Laredo and texted the FedEx tracking numbers to [REDACTED]. On December 4, 2020, BRADFORD texted [REDACTED], "Morning sweetie, I have not received money yet." [REDACTED] answered, "Calling those stupidos now give me a second sweet heart." That day, BRADFORD received a wire transfer into his checking account for approximately \$6,000 from a company in Mexico. On December 7, 2020, BRADFORD told [REDACTED] that [REDACTED]'s balance for the week was \$19,400. On December 8, 2020, BRADFORD received two more wire transfers into his checking account from the same Mexican company, totaling over \$6,000. That day, BRADFORD texted [REDACTED], "6k came in Mexican."

19. In 2021, BRADFORD and [REDACTED] switched their strategy from delivery by FedEx to personal drop-offs of gun parts at storage units. On June 7, 2021, BRADFORD sent [REDACTED] a photo of a storage unit and an address in Laredo.

20. BRADFORD provided counsel to [REDACTED] regarding the quality of the products. On June 22, 2021, [REDACTED] told BRADFORD there was a problem with the lower part kits. BRADFORD answered, "I will try to find out. It may have been the lowers. The lowers sending you next week will be from the company I used many times before." On June 23, 2021, [REDACTED] told BRADFORD there was another problem, that some of the uppers would not fit on the lowers, and sent BRADFORD a photo of a completed lower receiver next to a completed upper receiver. BRADFORD answered by offering manufacturing

advice to [REDACTED].

21. These efforts continued. On September 23, 2022, BRADFORD informed [REDACTED] by text message that he would be delivering “100 uppers,” referring to completed upper receivers. ERBE assisted BRADFORD in preparing this order by assembling the completed AR-15 upper receivers and providing them to BRADFORD.

22. On September 26, 2022, BRADFORD drove from New Braunfels to Laredo in his truck and delivered boxes to a storage unit. These boxes contained approximately 100 completed AR-15 upper receivers with 7.5” barrels. BRADFORD texted a photo of these boxes to [REDACTED]. Law enforcement seized these firearm parts before they could be picked up for delivery to [REDACTED] by executing a search warrant on the storage unit.

23. On October 1, 2022, [REDACTED] texted BRADFORD regarding an order for “complete uppers and mags.” ERBE assisted BRADFORD in preparing this order by assembling completed AR-15 upper receivers and providing them to BRADFORD.

24. On October 4, 2022, BRADFORD drove from New Braunfels to Laredo in his truck and delivered boxes to a storage unit. These boxes contained, among other gun parts, approximately 80 completed AR-15 upper receivers with 7.5” barrels and approximately 100 high-capacity 5.56 magazines. BRADFORD texted a photo of these boxes to [REDACTED]

25. On October 4, 2022, a co-conspirator arrived at the storage unit in Laredo and began unpacking, then re-packing the gun parts so they could be smuggled into Mexico by other members of the conspiracy. Law enforcement interrupted this process and seized the firearm parts.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
[18 U.S.C. § 933]

That from on or about June 25, 2022, and continuing up until on or about October 4, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED]
(6) TROY VERNON ERBE,

knowingly conspired to ship, transport, transfer, cause to be transported, and otherwise dispose of any firearm, to wit, AR-15 style rifles, to another person, in and affecting interstate and foreign commerce, having reasonable cause to believe that the use of the firearm by the recipient would constitute a felony, to wit, Conspiracy to Possess Firearms in Furtherance of a Drug Trafficking Crime, in violation of 18 United States Code, Section 933.

COUNT THREE
[18 U.S.C. § 924(h)]

That from on or about June 25, 2022, and continuing up until on or about October 4, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],
(6) TROY VERNON ERBE,

knowingly conspired to transfer firearms, to wit, AR-15 style rifles, to another person, having reasonable cause to believe that such firearm or ammunition would be used to commit a felony, to wit, Conspiracy to Possess Firearms in Furtherance of a Drug Trafficking Crime, in violation of 18 United States Code, Section 924(h).

COUNT FOUR
[18 U.S.C. §§ 554(a), 2]

On or about February 9, 2021, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],

aided and abetted by others, attempted to knowingly export and send firearm parts from the United States, to wit, approximately 4,000 M1919 machinegun belt links, and bought and facilitated the transportation of these firearm parts prior to exportation, knowing them to be intended for exportation contrary to Title 22, United States Code, Section 121.1, Category III, in that Defendants knew they did not have a license or written authorization for such export, in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT FIVE
[18 U.S.C. §§ 554(a), 2]

On or about July 20, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],

aided and abetted by others, attempted to knowingly export and send ammunition from the United States, to wit, approximately 250 rounds of Federal 12-gauge shot shell ammunition, and bought and facilitated the transportation of this ammunition prior to exportation, knowing it to be intended for exportation contrary to Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), in that Defendants knew they did not have a license or written authorization for such export, in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT SIX
[18 U.S.C. §§ 554(a), 2]

On or about September 26, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],
(6) TROY VERNON ERBE,

aided and abetted by each other, and others, attempted to knowingly export and send firearm parts from the United States, to wit, approximately 100 completed AR-15 upper receivers with 7.5” barrels, and bought, concealed, and facilitated the transportation and concealment of these firearm parts prior to exportation, knowing them to be intended for exportation contrary to Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), in that Defendants knew they did not have a license or written authorization for such export, in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT SEVEN
[18 U.S.C. §§ 554(a), 2]

On or about October 4, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],
(6) TROY VERNON ERBE,

aided and abetted by each other, and others, attempted to knowingly export and send firearm parts from the United States, to wit, approximately 80 completed AR-15 upper receivers with 7.5” barrels and approximately 100 high-capacity 5.56 magazines, and bought, concealed, and facilitated the transportation and concealment of these firearm parts prior to exportation, knowing them to be intended for exportation contrary to Title 15, Code of Federal Regulations, Sections

774 and 736.2(b)(1), in that Defendants knew they did not have a license or written authorization for such export, in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT EIGHT
[18 U.S.C. § 1956(h)]

That from on or about August 12, 2019, and continuing until on or about October 4, 2022, in the Western and Southern Districts of Texas, and the Republic of Mexico, Defendants,

(1) CHANDLER BRITAIN BRADFORD,
[REDACTED],
(6) TROY VERNON ERBE,

knowingly combined, conspired, and agreed with each other and others to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds to a place in the United States from and through a place outside the United States with the intent to promote the carrying on of a specified unlawful activity, that is, Smuggling of Goods from the United States, in violation of Title 18, United States Code, Section 554(a), in violation of Title 18, United States Code, Section 1956(a)(2)(A), and all in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Conspiracy to Smuggle Goods from the United States Violation and Forfeiture Statutes
[Title 18 U.S.C. §§ 371 and 554(a), subject to forfeiture pursuant to
Title 18 U.S.C. § 981(a)(1)(C) and Title 19 U.S.C. § 1595a(d),
as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violations set forth in Count One and Counts Four through Seven, the United States of America gives notice to Defendants **(1) CHANDLER BRITAIN BRADFORD,** **[REDACTED]**, **[REDACTED],** **(6) TROY VERNON ERBE** and **(7) JESUS GUZMAN-DELGADO**

of its intent to seek the forfeiture of the property listed below upon conviction and pursuant to Fed. R. Crim. P. 32.2, Title 18 U.S.C. § 981(a)(1)(C) and Title 19 U.S.C. § 1595a(d), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which state:

Title 18 U.S.C. § 981. Civil Forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

* * *

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation . . . of this title or any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Title 19 U.S.C. § 1595a. Forfeiture and other penalties

* * *

(d) Merchandise exported contrary to law

Merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be seized and forfeited to the United States.

Title 18 U.S.C. § 554 Smuggling Goods from the United States is an offense constituting “specified unlawful activity” as defined in Title 18 U.S.C. § 1956(c)(7).

II.

Firearms Trafficking Violations and Forfeiture Statutes

[Title 18 U.S.C. § 933, subject to forfeiture pursuant to Title 18 U.S.C §§ 934(a)(1)(A) and (B)]

As a result of the criminal violation set forth in Count Two, the United States of America gives notice to Defendants **(1) CHANDLER BRITAIN BRADFORD,** [REDACTED] [REDACTED] **and (6) TROY VERNON ERBE** of its intent to seek the forfeiture of the property listed below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. - Forfeiture and Fines

(a) Forfeiture.

(1) In General. — Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law—

- (A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, except that for any forfeiture of any firearm or ammunition pursuant to this section, section 924(d) shall apply.

III.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. § 924(h), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violations set forth in Count Three, the United States of America gives notice to Defendants **(1) CHANDLER BRITAIN BRADFORD,** [REDACTED] **and (6) TROY VERNON ERBE** of its intent to seek the forfeiture of the property listed below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922, or knowing importation or bringing into the United States or any possession thereof any firearm or ammunition in violation of section 922(l), or knowing violation of section 924, shall be subject to seizure and forfeiture under the provisions of this chapter. . .

IV.

Money Laundering Violation and Forfeiture Statutes

[Title 18 U.S.C. § 1956(h), subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]

As a result of the criminal violation set forth in Count Eight, the United States of America gives notice to Defendants **(1) CHANDLER BRITAIN BRADFORD,** [REDACTED] **and (6) TROY VERNON ERBE** of its intent to seek the forfeiture of the property listed below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which states:

Title 18 U.S.C. § 982.

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957, ... of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

The Notice of Demand for Forfeiture includes but is not limited to the Personal Property and Money Judgment described in Paragraphs V and IV.

**V.
PERSONAL PROPERTY**

(1) CHANDLER BRITAIN BRADFORD:

1. Box 1 Containing 25 AR-15 Upper Receivers W/ BCG and Charging Handle, Quad Rail, Black 7.5" Barrels;
2. Box 2 Containing 15 AR-15 Upper Receivers W/ BCG and Charging Handle, Quad Rail, Black 7.5" Barrels;
3. Box 3 Containing 10 AR-15 Upper Receivers W/ BCG and Charging Handle, Quad Rail, Stainless Steel 7.5" Barrels;
4. Box 4 Containing 20 AR-15 Upper Receivers W/ BCG and Charging Handle, Quad Rail, Stainless Steel 7.5" Barrels;
5. Box 5 Containing 10 AR-15 Upper Receivers W/ BCG and Charging Handle, Quad Rail, Black 7.5" Barrels, 20 AR-15 Upper Receivers W/ BCG/Ch, Quad Rail, Stainless Steel 7.5" Barrels;
6. One Box of 3 80% Receivers, Easy Jig And Jig Router;
7. 160 Rounds Assorted Manufacturer Ammunition CAL: Assorted;
8. \$2,668.00, more or less, in U.S. Currency;
9. Assorted Firearm Parts (Polymer80, Palmetto State Armory & Bear Creek Arsenal Parts);
10. Assorted Firearm Parts (Rubber Bin Containing Various Parts);
11. Firearm Parts, AR Rails, 8 Boxes X 25 Each, 200 Total;
12. Assorted Firearm Parts;
13. Assorted Firearm Parts;
14. 140 Buffer Tubes And Springs, Firearm Parts;
15. 134 PMAG 30 Round M4/AR;
16. 106 Stocks for AR;
17. 124 Firearm Parts, AR Rails;
18. 81 Firearm Parts Charging Handles;
19. 155 Firearm Parts, Stock Pads;
20. 43 Firearm Parts, Handgrips & Trigger Assembly;
21. 99 AR Upper Receiver, Firearm Parts;
22. Assorted Firearm Parts, 10 80% Lowers, 11 Receivers, AR Upper Receiver, 10 5.56 Full Auto, Bolt Carrier Group, 4 Pistol Brace Kits, Lower Parts Kit;
23. 100, 7.5 Inch 223 Barrels;
24. Storage Bin with Multiple Drawers Containing Lower Parts For AR-15;
25. Firearm Parts, AR Rails and Scopes;

26. Assorted Firearm Parts, Muzzle Breaks and Misc. Parts;
27. AIC - Builder Parts, Router 8 Drilling Blanks, Drill Bits, Manufacturing Tools;
28. 5 AR Kits W/ 80% Lower;
29. 2,860 Rounds Assorted Manufacturer Ammunition CAL: Assorted;
30. Central Machinery 12 Speed Bench Drill Press;
31. AR Handgrips, Muzzle Breaks, Charging Handles, Misc. Parts;
32. Charging Handles, AR Grips, Muzzle Breaks and Misc. Parts;
33. High-Capacity Mags for AR & Shotgun, Shotgun Stocks, 2 Barrels;
34. Firearm Parts, Misc. Barrels, AR Barrels, Glock Barrels;
35. Firearm Parts, Misc. Manufacturing Tools, Jigs, AR Armorer Mount, Scale;
36. One Box Containing Misc. Firearm Parts, Armorer Mat, Glock Parts, Foregrips;
37. Seven AR-15 Completed Upper Receivers, Two Have Barrels Less Than 16";
38. 5 Magazines and Other Firearm Accessories;
39. 3 Glock Style Slides with Barrels;
40. 2,723 Rounds Assorted Manufacturer Ammunition CAL: Assorted;
41. Five High-Capacity Magazines, Other Misc. Firearm Parts and 2 Magazines;
42. 36 Gun Rhino Safe, Model: CD6030X, Blue;
43. 50 Bolt Carrier Groups in Box From R&J Legacy Inc., Box 1 Of 2;
44. 50 Bolt Carrier Groups in Box From R&J Legacy Inc., Box 2 Of 2;
45. Approximately 203 AR-15 Barrel Nuts In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
46. 40 AR-15 Quad Handrails in a box from Jack at CSS Technology Solution Co. LTD in Hong Kong, China; Shipped September 28, 2022;
47. 40 AR-15 Quad Handrails in a box from Jack at CSS Technology Solution Co. LTD in Hong Kong, China; Shipped September 28, 2022;
48. 40 AR-15 Quad Handrails in a box from Jack at CSS Technology Solution Co. LTD in Hong Kong, China; Shipped September 28, 2022;
49. 40 AR-15 Quad Handrails in a box from Jack at CSS Technology Solution Co. LTD in Hong Kong, China; Shipped September 28, 2022;
50. 40 AR-15 Quad Handrails in a box from Jack at CSS Technology Solution Co. LTD in Hong Kong, China; Shipped September 28, 2022;
51. 418 One Ounce Coins (Silver);
52. 12 Two Ounce Coins (Silver);
53. 1 Five Ounce Coin (Silver);
54. 81 Assorted Coin Collection (62 Silver, 19 Gold);
55. 3 One Ounce Coins (Silver);
56. 2023 Chevrolet Corvette Coupe, VIN: 1G1YA2D40P5113302;
57. 2022 Ford Bronco Utility, VIN: 1FMDE5BH8NLA91636;
58. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses; and
59. Any property constituting or derived from, any proceeds the person(s) obtained directly or indirectly, as a result of the commission of the criminal offenses.

(6) TROY VERNON ERBE:

60. One Box Containing 48, 556 Palmetto State Armory Bolt Carrier ;
61. One Box Containing Misc. Firearm Parts and Drill Accessories And Receipts;

62. One Box Containing 46 Handguards;
63. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses; and
64. Any property constituting or derived from, any proceeds the person(s) obtained directly or indirectly, as a result of the commission of the criminal offenses.

VI.
Money Judgment

Money Judgment: A sum of money that represents the amount of proceeds obtained, directly or indirectly, property involved in such offenses, or traceable to such property as a result of the violations set forth in Counts One and Two and Counts Four through Eight, for which Defendants **(1) CHANDLER BRITAIN BRADFORD,** [REDACTED], **(6) TROY VERNON ERBE and (7) JESUS GUZMAN-DELGADO** are individually liable.

VII.
Substitute Assets

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property, up to the value of said money judgment, as substitute assets, pursuant to Title 21 U.S.C. 853(p) and Fed. R. Crim. P. 32.2(e)(1).

A TRUE BILL

[REDACTED]
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: 
FOR WILLIAM F. CALVE
Assistant United States Attorney